

STEPHEN J. NUTTING, ESQ.
Post Office Box 5093
Saipan, MP 96950
Telephone: (670) 234-6891
Facsimile: (670) 234-6893

Attorney for Defendant Han Nam Corporation

IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS

ZHAI LAN JIANG,

Plaintiff,

-v-

HAN NAM CORPORATION,

Defendant.

CIVIL ACTION NO. CV-07-0035

DEFENDANT'S PRE-DISCOVERY
DISCLOSURE STATEMENT

COMES NOW, Han Nam Corporation, defendant in the above entitled action, pursuant to the Civil Justice Reform Act to make the following pre-discovery disclosure:

1. Name of individuals likely to have discoverable information:

- | | | |
|----|----------------|------------------------|
| a. | Name: | ZHAI LAN JIANG |
| | Address: | c/o Mark Hanson |
| | Telephone No.: | (670) 233-8600 |
| b. | Name: | Mr. Jun Soo Park |
| | Address: | c/o Stephen J. Nutting |
| | | P.O. Box 5093 |
| | | Saipan, MP 96950 |
| | Telephone No.: | (670) 234-6891 |
| c. | Name: | Mrs. Kim Yang Park |
| | Address: | c/o Stephen J. Nutting |
| | | P.O. Box 5093 |
| | | Saipan, MP 96950 |
| | Telephone No.: | (670) 234-6891 |

1 d. Name: Employees of Han Nam Market
2 Address: c/o Han Nam Corporation
3 AAA 385 Caller Box 10001
4 Saipan, MP 96950
5 Telephone No.: (670) 288-3639

6 The above-listed persons should have information regarding the allegations of sex and
7 race based discrimination.

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9 2. Description of documents in the possession of Defendant:

- 10 a. Plaintiff's Employment Contract
11 b. Payroll records and copies of wage checks
12 c. List of Employees
13 d. Documents and Correspondence filed by EEOC
14 d. Receipts for medical billings paid to CHC

15 3. Disclosure of expert testimony: At this time, Defendant does not anticipate the
16 need for any expert testimony. If discovery unveils the need for expert testimony, the
17 Defendant will make the required disclosures to the Court and the Defendant by supplemental
18 filing pursuant to Fed. R. Civ. Pro. 26(e)(1) as soon as possible following the discovery of the
19 need for such testimony.
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21 Defendant through its attorney, Stephen J. Nutting, submits that it has fully complied
22 with the initial disclosures required by the Civil Justice Reform Act plan. If Plaintiff has any
23 questions regarding the information contained herein, or seeks additional information she
24 believes may have been omitted in this disclosure, the Defendant will comply with any request
25 for information in its possession as required by the Civil Justice Reform Act plan.
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1 DATED this 3rd day of January, 2008.

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4 /s/

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6 STEPHEN J. NUTTING
7 Attorney for Defendant
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